

REMARKS

Reconsideration of the present application is respectfully requested. The specification has been amended to conform to the drawing amendments and to make the title more descriptive. No new matter has been added. Claims 1-6, 10-14, 16-18, 21-23, 26-29, and 33-35 have been amended. New claims 45-53 have been added. Claims 1-53 are currently pending.

Title Objection

The title of the application was objected to as not being descriptive. In response, Applicants have amended the title to: "SYSTEM AND METHOD FOR TRANSFERRING A COMPRESSED DATA FILE TO A PERIPHERAL DEVICE."

Drawing Objections

The drawings were objected to because reference character "124" in figure 11 referred to both "cjOut" and "DrvQueryDeviceSupport function." Applicants propose correcting the drawings by referring to the "DrvQueryDeviceSupport function" using reference numeral "123."

Regarding a similar duplication, Applicants note that reference numeral "114" was also duplicated in FIG. 11. Applicants suggest renumbering the first instance (referring to the "pso" field) to "113." Thus, the ps0 field becomes "113" instead of "114."

As described above, the specification has been correspondingly amended. A replacement figure that includes the proposed changes is included for the Examiner's approval.

Rejections based on 35 U.S.C. § 112

Dependent claim 28 stands rejected under 35 U.S.C. § 112, second paragraph as being indefinite because “operating system” lacks sufficient antecedent basis. Claim 28 and its base claim 26 have been amended to cure the indefiniteness. In light of these amendments, Applicants respectfully request withdrawal of the 35 U.S.C. § 112 rejection of claim 28.

Rejections based on 35 U.S.C. § 102

The following claims stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,175,856 to Riddle (“Riddle”): 1-8, 10-19, 21-23, 26-31, 33-41, and 43. In light of the amendments made to the above-referenced claims, Applicants respectfully submit that these rejections have been overcome.

Amended claim 1 now recites a “peripheral” device in each of its clauses. As amended, claim 1 recites:

receiving a request to transfer a compressed data file to the *peripheral* device from the software application;

determining whether the *peripheral* device is configured to decompress the compressed data file;

if the *peripheral* device is configured to decompress the compressed data file, obtaining the compressed data file from the software application; and

transferring the data file to the *peripheral* device via a device driver interface.

Clearly, amended claim 1 is not anticipated by Riddle because Riddle does not disclose nor teach a method in connection with a *peripheral* device. In contrast, Riddle discloses a teleconferencing system whereby communication is facilitated between a sending system and a receiving system (Abstract, FIGS. 1-2, col. 1, line 57 - col. 2, line 49). Riddle teaches that the sending and receiving systems are computer systems where communication is made between two

computers. Macintosh computers are identified as exemplary computers (col. 4, line 15). Riddle's system requires that both the sending system (or processor) and receiving system (or processor) be able to compress data for transmission: "At least two data compressors, each of which compresses data from a transmitting processor according to a particular compression process" (col. 1, line 59-61). During a teleconference, each participant will generally be both sending and receiving data. Thus, data must be able to flow bidirectionally between a given recipient system and the sending system. As amended, claim 1 recites that the ultimate destination of the compressed data file is a *peripheral* device.

Accordingly, amended claim 1 is patentable over Riddle, and Applicants respectfully request withdrawal of the pending rejection. Applicants also respectfully request withdrawal of the 35 U.S.C. § 102(e) rejection of dependent claims 2-12 at least because they incorporate all the limitations of allowable claim 1 from which they depend.

Moreover, dependent claim 4 is separately patentable over Riddle. As amended, claim 4 recites, "passing a compressed data file pointer to the peripheral device; and receiving an indication whether the peripheral device is configured to decompress the compressed data file." Riddle, however, does not teach passing a *compressed-data-file pointer* to a *peripheral* device to determine whether the peripheral device is configured to decompress the compressed data file. Riddle reconciles available compressor/decompressor pairs to facilitate reception of compressed files. Riddle's compressor/decompressor reconciliation process does not teach passing a compressed data-file pointer as recited in claim 4. Although the Office Action cites col. 9, lines 50-56 for the proposition that Riddle teaches Applicants' claimed technique, the excerpt is devoid of teaching that a *compressed-data-file pointer* might be passed to a *peripheral* device to determine whether the peripheral device is configured to decompress the compressed data file.

For these additional reasons, Applicants respectfully submit that claim 4 is patentable over the prior art and request withdrawal of the pending § 102(e) rejection.

Dependent claim 5 is also separately patentable over Riddle. Claim 5 recites “performing coordinate transformations,” which is not taught by Riddle. As Applicants state on page 19, lines 1-2, coordinate transformations include at least computing the placement and size of the image on the page using the state associated with the GDI’s device context or hdc. The cited Riddle excerpt describes a conventional codec scheme using paired compression formulas and says nothing about coordinate transformations, which relate to computing the placement and size of the image on a piece of paper. For these reasons, in addition to the reasons provided above, Applicants respectfully submit that claim 5 is patentable over the prior art and request withdrawal of the pending § 102(e) rejection.

Furthermore, dependent claim 10 is separately patentable over Riddle. Claim 10 recites “receiving an *uncompressed* data file from the software application if the peripheral device is not configured to receive the compressed data file.” Riddle, in contrast, teaches to search for a better sending compressor, but to send the compressed file even if a poor decoder at the receiving end will be used (col. 10, lines 46-52). Riddle does not teach offering an alternative to uncompress the file. The Riddle process always sends the file in a compressed format. For these reasons, in addition to the reasons provided above, Applicants respectfully submit that claim 10 is patentable over the prior art and request withdrawal of the pending § 102(e) rejection.

Independent claim 13 recites “an application interface component for receiving the compressed data file from the application.” Applicants respectfully traverse this rejection. Riddle does not disclose nor teach an application interface component for receiving a

compressed data file. Claim 13 is not anticipated nor rendered obvious by Riddle and is therefore patentable over Riddle. Applicants respectfully request withdrawal of the pending § 102(e) rejection of claim 13 and of dependent claim 14, at least because it incorporates all the limitations of claim 13 from which it depends.

Applicant also traverses the § 102(e) rejections with respect to independent claims 15 and 26. Both claims are patentable over Riddle because each recites the following limitation: “if the device is configured to decompress the compressed data file,” return an answer or transfer the compressed data file to the device. As previously stated, Riddle, in contrast, teaches to search for the best sending compressor, but to send the compressed file even if a poor decoder at the receiving end must be used (col. 10, lines 46-52). Thus, Riddle lacks an “if” limitation in that the Riddle method will send the file in a compressed format irrespective of any condition. Riddle neither teaches nor suggests an alternative sending process in situations when the receiving system is not equipped to decode a file. Applicants respectfully request withdrawal of the pending § 102(e) rejection of independent claims 15 and 26. Dependent claims 16-25 and 27-34 are also patentable for at least the reason that they incorporate all the limitations of claims 15 and 26 from which they respectively depend.

Independent claim 35 recites “a third field containing data indicative of whether a device is configured to decompress the compressed data file.” Applicants respectfully traverse the § 102(e) rejection of claim 35. Riddle neither discloses nor teaches including a data structure that contains a field having data indicative of whether the device is configured to decompress a transmitted file. Rather, Riddle seeks to match a sending compressor with a receiving decompressor (col. 7, lines 56-57). Thus, Riddle retrieves a list of decompressors available on each processor (col. 9, lines 6-8) and then exchanges subsequent decompressor lists to find a

compatible structure for data transfer. However, there is no indication that data indicative of whether a device is configured to decompress *the compressed data file* is included in this exchange. Accordingly, Applicants respectfully request withdrawal of the pending § 102(e) rejection of independent claim 35. Dependent claims 36-44 are also patentable for at least the reason that they incorporate all the limitations of claim 35 from which they depend.

Rejections based on 35 U.S.C. § 103

The Office Action rejects seven dependent claims under 35 U.S.C. § 103(a) over Riddle in view of Applicants' admitted prior art: 9, 20, 24, 25, 32, 42, and 44. For the reasons stated above, Applicants respectfully submit that the aforementioned claims are patentable over the prior art by virtue of their dependency from allowable base claims 1, 15, 26 and 35. As discussed below, dependent claims 9, 20, 24, 25, 32, 42, and 44 are separately patentable over the combination of Riddle and Applicants' admitted prior art.

In support of the § 103(a) rejection, the Office Action states that Applicants' admitted prior art teaches a device such as a printer capable of receiving and processing compressed data files (page 1, lines 10-11 of Applicants' specification). To clarify, the recitation in Applicants' specification admits that certain conventional devices can *receive and process* compressed data files. Thus, while *receiving* compressed data files may be conventional, *transferring* such files in the context of Applicants' claimed invention is not. Accordingly, the admitted prior art does not undercut the patentability of Applicants' claimed invention, which is directed to the *transferring* or *sending* of data files to devices. Clearly, *transferring* or *sending* is different from *receiving*. Processes undertaken to send a file generally end at file transmission, which is when receiving processes begin. Applicants sought to solve a problem associated with *transferring* or *sending* a data file, not a problem associated with receiving it. Riddle sought to

solve yet a different problem: determining from a list of available choices paired codecs most suitable for data communication in a teleconferencing environment. Thus one skilled in the art would not be motivated to combine Riddle with the purported teachings of the prior art to arrive at Applicants' claimed invention. In any event, combining the teachings of Riddle and Applicants' admitted prior art does not yield Applicants' claimed invention.

Each of the rejected claims (9, 20, 24, 25, 32, 42, and 44) are patentable over Riddle in view of the prior art for the above reasons and because each claim depends from an independent base claim that includes a limitation to transfer the data file "if" the target device is configured to decompress the compressed data file. As explained above, Riddle, in contrast, teaches to merely select the best sending compressor from a given list. Riddle teaches to send the compressed file even if a poor decoder at the receiving end must be used: "the worst codec is the only codec that can reach that node, so the worst codec is what is used" (col. 10, lines 46-52). There is no suggestion from the prior art to offer alternative sending processes.

New Claims 45-53

New claim 45 recites:

A method in a computer system for rendering a compressed data file on a peripheral device in communication with a computer system, said method comprising:

receiving a request to send a compressed data file to the peripheral device;

determining whether the peripheral device is configured to decompress the compressed data file; and

if the peripheral device is configured to decompress the compressed data file, sending the compressed data file to the peripheral device, whereby the peripheral device can render the compressed data file; but

if the peripheral device is not configured to decompress the compressed data file, then uncompressing the compressed data file and sending the uncompressed data file to the peripheral device.

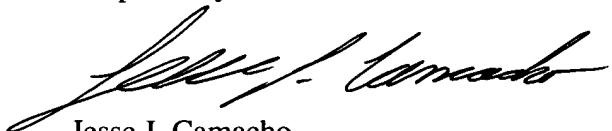
For the reasons discussed with respect to independent claims 15 and 26, claim 45 is not anticipated nor obvious in view of Riddle because Riddle does not teach an alternative to transferring compressed data files. Claim 45 is also patentable over Riddle because it recites a *peripheral* device, as explained above in connection with independent claim 1. Dependent claims 46-49 are patentable at least because each respectively incorporates the limitations of allowable base claim 45.

Dependent claims 50-53 respectively depend from base claims 13, 15, 26, and 35 and include a *peripheral* device limitation. For the reasons mentioned above in connection with the aforementioned base claims, dependent claims 50-53 are also patentable over the prior art because they incorporate all the limitations of base claims 13, 15, 26, and 35 respectively and allowance is hereby requested.

CONCLUSION

For the reasons stated above, claims 1-53 are now in condition for allowance. Applicants respectfully request withdrawal of the pending rejections and allowance of claims 1-53. If any issues remain that would prevent issuance of this application, the Examiner is urged to contact the undersigned prior to issuing a subsequent action. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 19-2112.

Respectfully submitted,



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